

EXHIBIT “B”

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From: Mullineaux, Theresa <Theresa.Mullineaux@huschblackwell.com>
Sent: Wednesday, February 21, 2024 11:35 AM
To: David Noonan <noonan@law-djn.com>; Knepper, Matt <Matt.Knepper@huschblackwell.com>; Melander, Brendan <Brendan.Melander@huschblackwell.com>
Cc: lento@radixlaw.com
Subject: RE: Settlement Demand Favorite Healthcare Staffing V. IASIS et al

David,

Thank you for your time on Friday. This email is privileged and inadmissible for any purpose, including impeachment, is made with a full reservation of all rights and without waiver or admission of any fact, matter, claim or contention and is forwarded to you pursuant to Rule 408 of the Federal Rules of Evidence and any applicable state statute, rule or common-law provision as applied and construed by applicable case law.

Our client is willing to accept all of the terms you propose below with the exception of the 30 day time frame. Our client is willing to pay the \$186,421 within 45 days. Please let us know if this is acceptable to your client.

Considering our settlement negotiations, we also propose waiting to serve our discovery objections and responses until we hear back from you regarding your client's stance on our counteroffer. Please advise if you are agreeable to this.

Thank you,

Theresa

Theresa Mullineaux
Senior Associate
Direct: 314-480-1742
Theresa.Mullineaux@huschblackwell.com

From: David Noonan <noonan@law-djn.com>
Sent: Friday, February 16, 2024 2:11 PM
To: Knepper, Matt <Matt.Knepper@huschblackwell.com>; Melander, Brendan <Brendan.Melander@huschblackwell.com>; Mullineaux, Theresa <Theresa.Mullineaux@huschblackwell.com>
Cc: lento@radixlaw.com
Subject: Settlement Demand Favorite Healthcare Staffing V. IASIS et al

[EXTERNAL EMAIL]

February 16, 2024